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ILLINOIS COMMERCE COMMISSION

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Cincinnati Bell Any Distance Inc.

Application for Certificate of Service
Authority to Operate as a
Facilities-based and Resale Provider of Local
and Interexchange Services Throughout
the State of Illinois

) 2007 DEC 10 A 11: 25

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) CHIEF CLERK'S OFFICE

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) Docket No. 07-0604
)

MOTION FOR PROTECTIVE ORDER

NOW COMES Cincinnati Bell Any Distance Inc. ("Applicant") and hereby moves the Illinois Commerce Commission ("Commission") for an order protecting Applicant's balance sheet and income statement ("Financial Documents") from disclosure for not less than five (5) years in order to protect highly proprietary information included therein. The Financial Documents are appended as Exhibit 5 to Applicant's Application for Certification to Become a Telecommunications Carrier, which was filed with the Commission contemporaneously with this motion. In support of its Motion, Applicant states as follows:

1. Applicant has filed an Application for Certificate to Become a Telecommunications Carrier ("Application") with the Commission contemporaneously with this motion.

2. Appended as Exhibits 5 to the Application, as required by the Commission's rules, are Applicant's most recent balance sheet and income statement ("Financial Documents").

3. The Financial Statements contain highly proprietary and confidential financial information, the disclosure of which to competitors or potential competitors would be detrimental to Applicant.

4. The telecommunications industry is highly competitive, and it is imperative that public disclosure of confidential information contained in the Application be avoided for a period of at least five years following the issuance of an order by the Commission because of the competitive harm which disclosure of such information would likely cause Applicant.

5. Section 7 of the Illinois Freedom of Information Act, 5 ILCS 140/7(g) exempts from public disclosure "trade secrets and commercial or financial information ... where the trade secrets or information are proprietary, privileged or confidential." The Financial Statements, which are the subject matter of this Motion, fall within this exemption.

6. Applicant seeks an order from this Commission protecting from disclosure in its entirety Applicant's Financial Statements for a period of not less than five years.

FURTHER, pursuant to ILL. ADMIN. CODE title 83, §200.525 (1996), Applicant respectfully requests that this motion be heard and decided without formal hearing.

WHEREFORE, Applicant respectfully requests that the Commission enter an order protecting from disclosure in its entirety Applicant's Financial Statements for a period of not less than five years.

RESPECTFULLY SUBMITTED THIS 6th day of December, 2007.

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